

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

<b>WSOU INVESTMENTS, LLC D/B/A</b>	<b>§</b>	<b>CIVIL ACTION 6:20-cv-01163-ADA</b>
<b>BRAZOS LICENSING AND</b>	<b>§</b>	<b>CIVIL ACTION 6:20-cv-01164-ADA</b>
<b>DEVELOPMENT,</b>	<b>§</b>	<b>CIVIL ACTION 6:20-cv-01165-ADA</b>
<i>Plaintiff,</i>	<b>§</b>	<b>CIVIL ACTION 6:20-cv-01166-ADA</b>
<b>v.</b>	<b>§</b>	<b>CIVIL ACTION 6:20-cv-01167-ADA</b>
<b>SALESFORCE.COM, INC.,</b>	<b>§</b>	<b>CIVIL ACTION 6:20-cv-01168-ADA</b>
<i>Defendant.</i>	<b>§</b>	<b>CIVIL ACTION 6:20-cv-01169-ADA</b>
	<b>§</b>	<b>CIVIL ACTION 6:20-cv-01170-ADA</b>
	<b>§</b>	<b>CIVIL ACTION 6:20-cv-01171-ADA</b>
	<b>§</b>	<b>CIVIL ACTION 6:20-cv-01172-ADA</b>

**DECLARATION OF SAM STAKE IN SUPPORT OF**  
**SALESFORCE.COM, INC.'S REPLY CLAIM CONSTRUCTION BRIEF**

I, Sam Stake, declare as follows:

1. I am a partner at Quinn Emanuel Urquhart & Sullivan LLP. If called as a witness,

I could and would testify competently to the information contained herein.

2. Attached hereto as Exhibit B is the Supplemental Declaration of Dr. Douglas C.

Schmidt in Support of Salesforce's Reply Claim Construction Brief, dated November 17, 2021.

**A. The '892 patent**

3. Attached hereto as Ex. 892-3 is a true and correct excerpt of the August 18, 2009

Applicant Arguments/Remarks Made in Amendment in the File History of the '892 patent.

**B. The '060 patent**

4. Attached hereto as Ex. 060-7 is a true printout of Merriam-Webster online

dictionary ("Event") (<https://www.merriam-webster.com/dictionary/event>).

I declare under penalty of perjury that the foregoing is true and correct. Executed on  
November 17, 2021.

*/s/ Sam Stake*  
Sam Stake